

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

DON LIA, MOBILE MANAGEMENT, LLC,  
and N.R. AUTOMOTIVE, INC.,

Plaintiffs

*-against-*

MICHAEL SAPORITO and  
JESSE ARMSTEAD,

Defendants.

Case No. CV-11-3621 (SJF/ETB)

**NOTICE OF MOTION TO INTERVENE  
AND FOR CONSOLIDATION**

**PLEASE TAKE NOTICE** that on a date to be set by the Court, the undersigned, attorneys for Movants, W&D Imports, Inc. d/b/a Willis Honda and David Davis, hereby move this Court to intervene pursuant to Federal Rule of Civil Procedure 24 and to consolidate with *W&D Imports, Inc. d/b/a Willis Honda v. Lia, et al.*, Case No. CV-11-4144 (E.D.N.Y. Aug. 25, 2011) pursuant to Federal Rule of Civil Procedure 42.

**PLEASE TAKE FURTHER NOTICE** that Movants will rely upon the brief and affidavit of counsel submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is enclosed with this filing.

DATED: September 21, 2011  
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